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Attorneys for Plaintiff
UNITED STATES OF AMERICA

UNITED STATES DISTRICT COURT

FOR THE CENTRAL DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

TEOFIL BRANK,
aka "Jarec Wentworth,"
aka "@JarecWentworh,"

Defendant.

CR No. 15-131-JFW

GOVERNMENT'S PROPOSED VOIR DIRE

Trial Date: May 12, 2015
Trial Time: 8:30 a.m.
Location: Courtroom of the
Hon. John F. Walter

Plaintiff United States of America, by and through its counsel
of record, the United States Attorney for the Central District of
California and Assistant United States Attorneys Kimberly D. Jaimez
and Vanessa Baehr-Jones, proposes and respectfully requests that the

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1 following voir dire questions be asked in addition to those usually
2 asked by the Court.

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4 Dated: May 5, 2015

Respectfully submitted,

5 STEPHANIE YONEKURA
6 Acting United States Attorney

7 ROBERT E. DUGDALE
8 Assistant United States Attorney
9 Chief, Criminal Division

10 /s/
KIMBERLY D. JAIMEZ
VANESSA BAEHR-JONES
Assistant United States Attorneys

11 Attorneys for Plaintiff
12 UNITED STATES OF AMERICA
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GOVERNMENT'S PROPOSED VOIR DIRE

I. GENERAL

1. Is there anything about the charges in this case that makes you unwilling or reluctant to serve as a juror?

2. Do you have any difficulty with your language skills, hearing or sight, or have any medical problems that could impair your ability to devote your full attention to this trial?

3. If you are selected as a juror and hear this case, you will be required to deliberate with eleven other jurors. This will require you to discuss the evidence and the law in this case with the eleven other jurors. Is there anything that leads you to believe that you would be unable or unwilling to engage in such discussions?

II. BLACKMAIL & EXTORTION LAWS

4. Do you believe that laws prohibiting blackmail and extortion should be abolished or not enforced?

5. Is there anything about the way the Federal Bureau of Investigation ("FBI") or any other law enforcement agency conducts investigations that would make it difficult for you to render a fair and impartial verdict in this case?

6. Have you or a family member or a close friend ever solicited, demanded, requested, or accepted so-called "hush money"? If so, would you feel more comfortable discussing the matter privately with the Court and the attorneys?

7. Do you have any reservations or doubts in your ability to be fair to both sides in a case charging someone with violations of federal laws involving extortion?

8. Have any of you been a member of, or associated in any manner with, a group, society, or organization that advocates First

1 Amendment rights of free speech? Please describe your involvement
2 with such activities.

3 9. Do any of you feel that the laws of this country are
4 unconstitutional or unfair in any way?

5 10. Do any of you believe that the government should not
6 prosecute non-violent cases?

7 **III. JUROR'S EXPERIENCE WITH LAW ENFORCEMENT**

8 11. Have you, or any of your close friends or relatives, ever
9 been arrested, charged with, or convicted of any crime? If so:

10 a. Would you please describe the circumstances?

11 b. Is there anything about those circumstances that would
12 prevent you from being fair and impartial in this case?

13 12. Have you, or any of your close friends or relatives, ever
14 had any contact with any law enforcement officer? If so, do you
15 think the officer acted professionally and fairly? Do you have any
16 positive or negative feelings as a result of that contact?

17 13. Have you, or any of your close friends or relatives, ever
18 filed a lawsuit or complaint concerning the conduct of a law
19 enforcement officer?

20 14. Do you believe that you, or any of your close friends or
21 relatives, have ever been falsely accused of committing a crime?

22 15. Do any of you think that law enforcement or the criminal
23 justice system is not fair or needs to be changed?

24 16. Do any of you think that law enforcement or the criminal
25 justice system treats certain individuals more harshly than others?

26 17. Have you or have any of your close relatives or friends had
27 any contact with federal agents and police officers, including the
28 FBI? If so, what was the nature of the contact? Do you feel that

1 you or your family member or friend was treated unfairly by the
2 agency or officer?

3 18. You will hear testimony in this case from FBI agents. Is
4 there anything that you have experienced, seen, heard, or read about
5 this agencies (or any other federal agency or police department) that
6 would prevent you from fairly assessing the credibility of the law
7 enforcement officers who will be testifying in this case?

8 19. Do you have any feelings regarding the criminal justice
9 system generally that might affect your ability to consider the
10 evidence in this case fairly and impartially, and to base your
11 verdict only on the evidence presented in this case?

12 **IV. KNOWLEDGE OF THE CASE & SPECIFIC CASE MATTERS**

13 20. Do you know or are you familiar with any of the following
14 individuals, who may be witnesses in this case? [The Court is
15 respectfully requested to read the government's and the defendant's
16 witness lists.]

17 21. During the course of this case you'll hear that the alleged
18 Victim was potentially involved in certain illicit activity, namely
19 solicitation of prostitution. Would knowing this fact affect your
20 ability to consider the evidence in this case fairly and impartially,
21 and to base your verdict only on the evidence presented in this case?

22 **V. PUNISHMENT AND SYMPATHY**

23 22. The potential punishment for the offenses charged in the
24 indictment is a matter that should never be considered by the jury in
25 any way in arriving at an impartial verdict as to the guilt or
26 innocence of the accused. Will each of you be able to conduct your
27 duties as jurors in this case without speculating about or being
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1 influenced in any way by whatever punishment may or may not be
2 imposed in this case?

3 23. There are some people who, for moral, ethical, or religious
4 reasons, may find it difficult or uncomfortable to pass judgment on
5 the conduct of others. Is there anyone of you who holds such
6 beliefs, or who might be affected by such beliefs?

7 24. Irrespective of your personal feelings about any issue that
8 may arise in this case, will you follow the law as the Court
9 instructs you to during this case?

10 25. Knowing what you now know about this case, do you have any
11 reservations about your ability to hear the evidence, deliberate and
12 return and fair and impartial verdict?